

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

SHAQUILLE DUKES; CREDALE MILES;     )  
and MARQWANDRICK MORRISON;     )  
                    Plaintiffs,     )  
                    vs.     )  
FREEPORT HEALTH NETWORK     )  
MEMORIAL HOSPITAL, a Not-for-profit     )  
Corporation; RYAN GODSIL, individually     )  
And as an agent of FREEPORT HEALTH     )  
NETWORK MEMORIAL HOSPITAL;     )  
THE CITY OF FREEPORT,     )  
a Municipal Corporation; SERGEANT     )  
JEFF ZALAZNIK, individually and as an     )  
OFFICER DAN MOORE, individually and as     )  
an agent of the CITY OF FREEPORT;     )  
OFFICER JUSTIN HOLDEN, individually     )  
and as an agent of the CITY OF FREEPORT;     )  
                    Defendants.     )

Court No.: 3:19-cv-50189  
Judge: Hon. John Z. Lee  
Magistrate: Hon. Lisa A. Jensen

**JOINT COVID-19 STATUS REPORT**

1. Discovery:

- A. Briefly describe the status of discovery: **The parties have completed substantial written discovery, including Rule 26 initial disclosures, issuance of subpoenas and issuance of and answers to written discovery. The parties have begun to discuss deposition dates for the Plaintiffs and have discussed presenting witnesses from Freeport Health Network remotely.**
- B. Propose an agreed revised discovery schedule if the current schedule needs revision. **The parties propose the following revised discovery schedule: The deadline for parties to amend pleadings, add counts or parties, and file third-party complaints is 01/01/2021; 26(a)(2)(C) disclosures by 01/01/2021; supplemental Rule 26(e) disclosures by 01/01/2021; fact discovery ends on 04/01/2021; dispositive motions due by 05/01/2021; Plaintiffs' expert report due by 01/01/2021 and depositions by 03/01/2021; Defendants' expert reports due by 02/01/2021 and depositions by 03/01/2021.**
- C. If the Court has not entered a discovery schedule, please propose dates for the following: **N/A.**

2. Motions:

- A. Briefly describe any pending motions, as well as any motions a party anticipates filing in the next 45 days. **None.**
  - B. Propose an agreed [revised] briefing schedule for any pending or anticipated motions. **N/A.**
- 3. Status of Settlement Discussions:
  - A. Describe the status of any settlement discussions and whether the parties request a settlement conference. **Plaintiff issued a demand and has not received a counteroffer at this time. The parties do not request a settlement conference at this time.**
- 4. Other Issues:
  - A. Briefly describe any other issues that require Court action and request any agreed action that the Court can take without a hearing. **None.**
  - B. Indicate whether the parties believe a telephonic hearing with the Court is necessary and time sensitive, and, if so, identify the issue(s) that warrant discussion. **No.**

Respectfully Submitted,

ROMANUCCI & BLANDIN, LLC

/s/ Ian Fallon

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